

REQUEST FOR PERSONAL INTERVIEW

Applicants respectfully request that a personal interview with the Examiner and his supervisor be granted prior to first action in this continuing application in accordance with MPEP §§706.07(b) and 713.02. The Examiner is respectfully requested to promptly contact Applicants' undersigned representative to schedule a personal interview.

REMARKS

Claims 1, 3-11, 13-21 and 23-30 are pending in this application. By this Amendment, claims 1, 10, 11, 13-21 and 23-30 are amended. No new matter is added.

The claim amendments substantially correspond to the amendments made to claims 1, 10, 11, 13-21 and 23-30 by the August 7, 2003 Amendment in the parent application. Additionally, claims 10, 20 and 30 are amended to be in independent form.

In the parent application, amended claims 1, 3-11, 13-21 and 23-30 under 35 U.S.C. §102(e) over U.S. Patent No. 6,480,192 to Sakamoto et al. (hereinafter, "Sakamoto"). This rejection was and is respectfully traversed.

The rejection as set forth in the September 10, 2003 Final Office Action repeats nearly verbatim the language of claim 1 with parenthetical citations to text of Sakamoto. However, the Final Office Action does not clearly set forth that which allegedly corresponds to each of the positively recited elements of claim 1. Applicants are left to assume which elements disclosed in the cited text of Sakamoto are alleged to correspond to the elements recited in claim 1 and the other independent claims as well. Further, the Final Office Action completely ignores certain language recited in claim 1, as discussed below.

The January 12, 2004 Advisory Action provides little clarification in this regard, again failing to point out exactly which elements allegedly correspond to the elements recited in the independent claims. Applicants respectfully submit that this deficiency renders the rejection improper as it renders the factual basis for the rejection and the Examiner's reasoning unclear.

Therefore, the rejection as best understood by Applicants is traversed as follows.

Claim 1 recites inter alia "a blurring section for blurring an object first image of a predetermined object . . . to generate a blurred object second image." As recited in claim 1, "the predetermined object comprises an objective target having at least one target surface that expresses a target of the predetermined object, and an objective foundation that expresses a foundation of the target according to a background of the predetermined object." As further recited in claim 1, "the blurring section blurs an image of the objective target to bring an image of the objective foundation into view." It is respectfully submitted that Sakamoto fails to disclose, teach or suggest this claimed combination of features.

Sakamoto is concerned with image processing in which entire sections of the image are blurred according to the distance of the given section from a foreground section (e.g., the point of an observer or camera). Specifically, Sakamoto is directed to image processing techniques in which objects in a foreground section of the image are in focus and objects in background sections of the image are blurred, objects in more distant background sections being more blurred. See, for example, column 1, lines 13-20, 39-45 and 49-55 and column 2, lines 1-11 of Sakamoto.

As shown in Fig. 6 of Sakamoto, for example, the image to be displayed is divided into near-, mid- and far-distance object groups 152, 154 and 156 (col. 11, lns. 1-9). These "object groups" correspond to near-, mid- and far-distance image groups 152a, 154a and 156a. The image groups 152a, 154a and 156a are processed and blurred to produce blurred image groups 154a' and 156a", as shown in Fig. 15 of Sakamoto, for example (col. 16, lns. 6-16). Thus, according to Sakamoto, different sections of the displayed image are blurred to a desired degree based on the distance of that section from the observer or camera. In Fig. 15: images of objects in the near-section 152a are not blurred at all; images of objects in the mid-section 154a' are blurred; and images of objects in the far-section 156a" are more blurred.

As illustrated by object OB4a, for example, an object may appear partially in more than one section, the portion of the object in one section having an image that is more/less blurred than an image of the portion of the object in the other section.

Because Sakamoto is directed to blurring images of objects based on the section of the overall image in which the images of objects appear, it is unclear which object disclosed by Sakamoto is alleged to correspond to the predetermined object recited in claim 1. The September 10, 2003 Final Office Action cites column 2, lines 2-11 with respect to this claim language. However, this cited text generally refers to "blurred images" and "distinct images" and fails to identify any object that allegedly corresponds to the predetermined object recited in claim 1.

As recited in claim 1, the predetermined object comprises an objective target and an objective foundation. Again, the September 10, 2003 Final Office Action fails to identify a specific corresponding element in Sakamoto. Column 13, line 17 of Sakamoto is cited by the Final Office Action with respect to the "objective target having at least one surface." This cited text generally refers to "surfaces of objects OBn." Thus, Applicants assume that any of the objects OB0a, OB1a, OB3a, OB4a, OB6a, OB7a, OB8a, OB9a, OB10a and OB11a are considered by the Office Action to correspond to the predetermined object recited in claim 1.

While the objects OBn arguably have at least one surface, and thus arguably comprise an objective target, the objects OBn disclosed by Sakamoto do not comprise an objective foundation. Column 2, line 13 of Sakamoto is cited by the Final Office Action with respect to the "foundation for expressing a foundation of the object according to a background of the object." This cited text refers to a two-dimensional background image on which an image of a three-dimensional object is rendered. As shown in Fig. 15, three-dimensional objects OB0a, OB1a, OB3a, OB4a, OB6a, OB7a, OB8a, OB9a, OB10a and OB11a are rendered on a background BG that includes objects such as clouds 300-303. The objects OBn therefore do not comprise the background BG.

The Advisory Action states that "a background, by definition, is a foundation, i.e. an object which is overlaid on a surface." Applicants do not understand how a background or foundation is "an object which is overlaid on a surface." The background BG in Sakamoto is clearly not "overlaid on a surface." Further, Applicants respectfully submit that a background is not defined as a foundation. The Examiner has provided no support for the asserted definition.

In addition, there is simply no disclosure in Sakamoto that an image of the background BG is brought into view by blurring an image of the "objective target" OBn. The Final Office Action completely fails to address the recitation in claim 1 that "the blurring section blurs an image of the objective target to bring an image of the objective foundation into view." The Final Office Action cites column 2, lines 2-11 only with respect to "a section for blurring an object." As discussed above, this cited text generally refers to "blurred images" that are more distant and "distinct images" in front of the "blurred images." According to Sakamoto, the "distinct images" are in focus. However, Sakamoto does not disclose, teach or suggest that the blurring of the "blurred images" brings the background BG into view.

The Advisory Action refers to the May 7, 2003 Non-final Office Action as stating that "Sakamoto discloses where the object is blurred according to a progression of the predetermined game . . . i.e. when the cars move into view." However, the cars are not alleged to be the foundation. According to the Final Office Action and the Advisory Action, the background BG is alleged to be the foundation. Thus, this reference to the Non-final Office Action by the Advisory Action is inapposite.

In view of the foregoing, it is respectfully submitted that Sakamoto cannot reasonably be considered to disclose, teach or suggest every feature recited in claim 1. Therefore, it is respectfully submitted that claim 1 is patentable over Sakamoto. Further, it is respectfully submitted that claims 3-9 are patentable at least in view of the patentability of claim 1 from which they depend, as well as for the additional features they recite.

The arguments presented above apply equally to independent claims 10, 11, 20, 21 and 30. Thus, it is respectfully submitted that Sakamoto cannot reasonably be considered to disclose, teach or suggest every feature recited in claims 10, 11, 20, 21 and 30. Therefore, it is respectfully submitted that claims 10, 11, 20, 21 and 30 are patentable over Sakamoto. Further, it is respectfully submitted that claims 13-19 and 23-29 are patentable at least in view of the patentability of claims 11 and 21 from which they respectively depend, as well as for the additional features they recite.

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1, 3-11, 13-21 and 23-30 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



William P. Berridge
Registration No. 30,024

Klifton L. Kime
Registration No. 42,733

WPB:KLK/kzb

Date: March 5, 2004

OLIFF & BERRIDGE, PLC
P.O. Box 19928
Alexandria, Virginia 22320
Telephone: (703) 836-6400

<p>DEPOSIT ACCOUNT USE AUTHORIZATION Please grant any extension necessary for entry; Charge any fee due to our Deposit Account No. 15-0461</p>
--